

REMARKS

In accordance with the foregoing, claims 1, 5, 6, 17, 21, and 22 have been amended, and claims 1-25 are pending and under consideration. No new matter is presented in this Amendment.

REJECTIONS UNDER 35 U.S.C. §102:

Claims 1-3 10 and 12 are rejected under 35 U.S.C. §102(e) as being anticipated by Herigstad et al. (U.S. Patent 6,731,316) parent to U.S. Publication No. 2004/0174400), hereinafter "Herigstad." The Applicants respectfully traverse the rejection and request reconsideration.

Regarding the rejection of independent claim 1, it is noted that amended claim 1 teaches an interpreting of an object program for an object picture embedded in a markup picture to **generate input item map information necessary for focusing on input items in the object picture**. In contrast, Herigstad only discloses an interpreting of a markup document to display a markup picture (or page). Specifically, Herigstad suggests neither an interpreting of an object program, nor an interpreting of a document to generate input item map information. First, it is respectfully noted that **object picture content embedded in a markup picture is distinguishable from a wireless mark-up language (WML) page or WML content**. WML was designed to display simple content applicable for a web browser of a mobile device. While conventionally, content or images with corresponding hyperlinks may be included in a WML card (i.e., one navigation unit), Herigstad does not suggest, implicitly or explicitly, a WML card or content that includes an object picture having a corresponding object program and including at least one input item. Specifically, referring to FIG. 8 of Herigstad, the labels 160 and 162 cited by the Examiner in the Office Action mailed June 29, 2007 are not object pictures, but are input items encoded in the WML content provided by the web server (paragraph [0040]). Therefore, Applicants respectfully submit that the WML content applied by Herigstad and cited by the Examiner (paragraph [0040], FIG. 8) does not correspond to the object picture of the present claim embedded in a markup picture of a markup document. Moreover, on page 2 of the Advisory Action mailed on September 6, 2007, the Examiner states that the WML card is an object picture (and presumably, the WML deck is the markup picture). However, it is noted that the WML card is not an object picture. An object picture is content that is **embedded** in a

markup picture (i.e., an object picture is displayed concurrently and inside of a markup picture). In contrast, the WML card is not embedded in another page (i.e., a markup picture or document) (paragraph [0040] and reference numeral 70 in FIG. 2A, the entire displayed screen is encoded in one card). In actuality, a WML card is a markup picture (and not a portion of a markup picture), and a plurality of WML cards (i.e., the WML deck) is a plurality of markup pictures that are linked together. For example, a website with a plurality of web pages that are linked together is not one markup document. Rather, each web page of the website has its own separate markup document (such as an HTML document). In other words, Applicants note that even though the WML cards are associated together by a WML deck, the totality of WML cards (i.e., the WML deck) is not one markup document or picture. Rather, each card is a separate file that is displayed individually, as opposed to an object picture that is displayed concurrently and inside of a markup picture. Therefore, Applicants respectfully submit that the WML card interpreted by the web browser to display an entire display screen does not correspond to the object program for displaying only the object picture (and not the entire display screen or the markup picture). Second, Herigstad does not suggest an interpreting of an object program (or any content document, such as an XML document or a WML card) **to generate input item map information** necessary for focusing on input items of a corresponding object picture. Rather, the content document in Herigstad is already encoded to correspond to a physical layout of input buttons (paragraph [0009], "The output options are patterned on the first output to correspond to a physical layout of the numbered buttons... The new navigation options are patterned to correspond with the physical layout of the numbered buttons and each option is correlated with one of the numbered buttons"). Herigstad only suggests interpreting a content document to convert the content document to a WML format (paragraph [0040]) or to display the content (paragraph [0041], and the display surface of claim 1). That is, Herigstad does not suggest an interpreting of the content to generate input item map information, but rather a content document to display content that is configured to already correspond to an input item map (determined by a physical layout of an input unit, paragraph [0009]). Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an interpreting of an object program to generate input item map information necessary for focusing on input items, as recited in claim 1.

Regarding the rejection of claim 2, it is noted that this claim depends from claim 1 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 2 recites the object program having an "independent program structure according to an extensible

markup language (XML) document and a Java program.” In contrast, the stored programs (which may be Java programs) referred to by the Examiner in paragraph [0041] of Herigstad are not object programs to display an object picture having the input items (the WML interpreter interprets a markup document corresponding to a markup picture, and not an object picture, to display the input items). Thus the Java program recited in claim 2 is patentably distinct from the programs recited by Herigstad. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an interpreted object program having an independent program structure according to an XML document and a Java program, as recited in claim 2.

Regarding the rejection of claim 3, it is noted that this claim depends from claim 1 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 3 recites a generating of the input item map information based on information on **input item types**, and **generating the input item map information** based on the information. In contrast, Herigstad teaches only the displaying of input items that are provided according to a predetermined input item map (i.e., a physical layout of an input unit (paragraph [0009])). Moreover, Herigstad makes no mention of the types of input items. Specifically, Herigstad does not suggest that the XML is used to describe input types, as stated by the Examiner. Furthermore, the database referred to by the Examiner (paragraph [0041]) is explicitly stated to store cards and decks (i.e., WML documents), and not XML pages or information. There is no suggestion in the entirety of Herigstad that input item information is obtained to generate an input item map. Rather, as stated above, Herigstad proposes content pages in which the input items are provided to correspond to a predetermined input item map (paragraph [0009]). Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, the generating of the input item map information based on information on input item types, as recited in claim 3.

Regarding the rejection of independent claim 10, it is noted that claim 10 recites “an object program to display an object picture having at least one input item and embedded in a markup picture formed by the markup document.” In contrast, the input items of Herigstad are included in a markup (WML) document (paragraph [0040]), and not an object program. It is respectfully noted that an **object picture embedded in a markup picture is distinguishable from a wireless mark-up language (WML) page or content**. WML was designed to display simple content applicable for a web browser of a mobile device. While conventionally, content or images with corresponding hyperlinks may be included in a WML card (i.e., one navigation

unit), Herigstad does not suggest, implicitly or explicitly, a WML card or content that includes an object picture having a corresponding object program and including at least one input item. Specifically, referring to FIG. 8 of Herigstad, the labels 160 and 162 cited by the Examiner are not object pictures, but are input items encoded in the WML content provided by the web server (paragraph [0040]). Therefore, Applicants respectfully submit that the WML content applied by Herigstad and cited by the Examiner (paragraph [0040], FIG. 8) does not correspond to the object picture of the present claim embedded in a markup picture of a markup document. Moreover, on page 2 of the Advisory Action mailed on September 6, 2007, the Examiner states that the WML card is an object picture (and presumably, the WML deck is the markup picture). However, it is noted that the WML card is not an object picture. An object picture is content that is **embedded** in a markup picture (i.e., an object picture is displayed concurrently and inside of a markup picture). In contrast, the WML card is not embedded in another page (i.e., a markup picture or document) (paragraph [0040] and reference numeral 70 in FIG. 2A, the entire displayed screen is encoded in one card). In actuality, a WML card is a markup picture (and not a portion of a markup picture), and a plurality of WML cards (i.e., the WML deck) is a plurality of markup pictures that are linked together. For example, a website with a plurality of web pages that are linked together is not one markup document. Rather, each web page of the website has its own separate markup document (such as an HTML document). In other words, Applicants note that even though the WML cards are associated together by a WML deck, the totality of WML cards (i.e., the WML deck) is not one markup document or picture. Rather, each card is a separate file that is displayed individually, as opposed to an object picture that is displayed concurrently and inside of a markup picture. Therefore, Applicants respectfully submit that the WML card interpreted by the web browser to display an entire display screen does not correspond to the object program for displaying only the object picture (and not the entire display screen or the markup picture). Therefore, Applicants respectfully submit that the WML card interpreted by the web browser to display an entire display screen does not correspond to the object program for displaying only the object picture (and not the entire display screen or the markup picture). Furthermore, it is noted that claim 10 recites "the object program containing information on an input item type... necessary for generating input item map information." In contrast, Herigstad does not suggest an object program (or any content document, such as a WML card) to generate input item map information. Rather, the **content document in Herigstad is already encoded to correspond to a predetermined input item map**, which is

based on a physical layout of input buttons (paragraph [0009], "The output options are patterned on the first output to correspond to a physical layout of the numbered buttons... The new navigation options are patterned to correspond with the physical layout of the numbered buttons and each option is correlated with one of the numbered buttons"). Moreover, the predetermined input item map of Herigstad is based on positions of input items and input buttons. Herigstad makes no mention of the types of input items. Specifically, Herigstad does not suggest that the XML is used to describe input types, as stated by the Examiner. Furthermore, the database referred to by the Examiner (paragraph [0041]) is explicitly stated to store cards and decks (i.e., WML documents), and not XML pages or information. There is no suggestion in the entirety of Herigstad that input item information is included in a content page to generate an input item map. Rather, as stated above, Herigstad proposes content pages in which the input items are provided to correspond to a predetermined input item map (paragraph [0009]). Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an object program displaying an object picture having at least one input item and embedded in a markup picture, wherein the object program contains information on an input item type necessary for generating input item map information.

Regarding the rejection of claim 12, it is noted that this claim depends from claim 10 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 12 recites the object program having "an independent program structure according to an extensible markup language (XML) document and a Java program." In contrast, the stored programs (which may be Java programs) referred to by the Examiner in paragraph [0041] of Herigstad are not object programs to display an object picture having the input items (the WML interpreter interprets a markup document corresponding to a markup picture, and not an object picture, to display the input items). Thus the Java program recited in claim 12 is patentably distinct from the programs recited by Herigstad. Therefore, the Applicants respectfully submit that Herigstad fails to disclose, implicitly or explicitly, an interpreted object program having an independent program structure according to an XML document and a Java program, as recited in claim 12.

REJECTIONS UNDER 35 U.S.C. §103:

Claims 4-9, 13-17 and 19-20 are rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Xu et al. (U.S. Patent 6,907,574) hereinafter "Xu". The Applicants respectfully traverse and request reconsideration.

Regarding the rejection of claim 4, it is noted that this claim depends from claim 3 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of independent claim 5, it is noted that amended claim 5 now recites a transmitting of a message from a markup interpretation engine to an object interpretation engine “for moving an input item focus **from inside of the markup picture**, but outside of the object picture embedded in the markup picture and outside of any other object picture, to inside of the object picture.” In contrast, Xu teaches a method of moving a focus **from one object picture (frame) to another object picture**. That is, Xu does not suggest moving the focus from a markup picture. Though the Applicants agree with the Examiner that a function call (message) is utilized to move the focus, the Applicants further stress that the function call is not used to move the focus from the markup picture to the object picture, as is clarified in the amended claim 5. In fact, the FIG. 5A and Xu (column 14, lines 33-41) cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, “...inside the current frame”). Moreover, on page 2 of the Advisory Action, the Examiner states that Xu teaches a transfer of the focus from one input item to another input item. However, the independent claim 5 is clearly distinguishable in that the focus is not merely moved from one input item to another, but **from a markup picture input item to an object picture input item**. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from the markup picture (and not an object picture) to the object picture, as recited in claim 5.

Regarding the rejection of independent claim 6, it is noted that amended claim 6 now recites a transmitting of a message from an object interpretation engine to a markup interpretation engine “for moving an input item focus from the object picture **to the markup picture**, but outside of the object picture embedded in the markup picture and any other object picture.” In contrast, Xu teaches a method of moving a focus **from one object picture (frame) to another object picture**. That is, Xu does not suggest moving the focus to a markup picture. Though the Applicants agree with the Examiner that a function call (message) is utilized to move the focus, the Applicants further stress that the function call is not used to move the focus from the object picture to the motion picture, as is clarified in the amended claim 6. In fact, the FIG. 5A cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing moves to another object picture, as opposed to the markup picture

(operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Moreover, on page 2 of the Advisory Action, the Examiner states that Xu teaches a transfer of the focus from one input item to another input item. However, the independent claim 6 is clearly distinguishable in that the focus is not merely moved from one input item to another, but **from an object picture input item to a markup picture input item**. Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from the object picture to the markup picture (and not an object picture), as recited in claim 6.

Regarding the rejection of claim 7, it is noted that that this claim depends from claim 5 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 7 recites the message transmission comprising "transmitting information on a position of a **currently focused markup picture input item**." In contrast, Xu teaches a method of moving a **currently focused object picture input item**. In fact, the FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, "...inside the current frame"). Therefore, the Applicants respectfully submit that Xu fails to disclose a transmission of information on a position of a currently focused **markup picture input item**, as recited in claim 7.

Regarding the rejection of claim 8, it is noted that this claim depends from claim 7 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 8 recites a moving of "the focus from **the currently focused markup picture input item** to a next object picture input item." In contrast, Xu teaches a method of moving a **currently focused object picture input item focus** (i.e., moving the input item from one object frame to another object frame). In fact, the FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, "...inside the current frame"). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the markup picture input item to the object picture input item, as recited in claim 8.

Regarding the rejection of claim 9, it is noted that this claim depends from claim 5 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 9 recites a moving of "the focus from **the currently focused markup picture input item** to a next object picture input item." In contrast, Xu teaches a method of moving an **object input item focus** (i.e., moving the input item from one object frame to another object frame). In fact, the

FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, "...inside the current frame"). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of the focus from the markup picture input item to the object picture input item, as recited in claim 9.

Regarding the rejection of independent claim 13, it is noted that claim 13 recites "transmitting a message for moving a focus on one of the object picture input items... and **focusing on one of the markup picture input items**... in response to the message." In contrast, Xu (col. 12, lines 1-21, and col. 14, lines 33-41) teaches a method of moving a focus from an object picture input item **to another object picture input item**. While the Applicants point out that Xu discloses object pictures (frames) in a markup picture (as opposed to Herigstad, which only discloses a markup picture (WML document) and does not disclose object pictures in the WML or content document), Applicants note that Xu only discloses moving a focus between object picture input items. In particular, Applicants note that Xu makes no mention of a method of moving to a markup picture input item, as in the present claim 13. In fact, the FIG. 5A cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing moves to another object picture, as opposed to the markup picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Moreover, on page 2 of the Advisory Action, the Examiner states that Xu teaches a transfer of the focus from one input item to another input item. However, the independent claim 13 is clearly distinguishable in that the focus is not merely moved from one input item to another, but **from an object picture input item to a markup picture input item**. Therefore, the Applicants respectfully submit that Herigstad and Xu fail to disclose, implicitly or explicitly, transmitting a message for moving a focus on one of the object picture input items to one of the markup picture input items in response to the message, as recited in claim 13.

Regarding the rejection of claim 14, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of claim 15, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 15 recites a moving of "the focus from a currently focused object picture input item to a next **markup picture input item**." In contrast, Xu teaches a method of moving a focus **from**

one object picture (frame) to another object picture. That is, Xu does not suggest moving the focus to a markup picture. In fact, the FIG. 5A cited by the Examiner clarifies that the focusing moves to another object picture, as opposed to the markup picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from the object picture to the markup picture (and not an object picture), as recited in claim 15.

Regarding the rejection of claim 16, it is noted that this claim depends from claim 13 and is, therefore, allowable for at least the reasons set forth above. Furthermore, it is noted that claim 16 recites a moving of "the focus from a currently focused object picture input item to a next focused **markup picture input item.**" In contrast, Xu teaches a method of moving a focus **from one object picture (frame) to another object picture.** That is, Xu does not suggest moving the focus to a markup picture. In fact, the FIG. 5A cited by the Examiner clarifies that the focusing moves to another object picture, as opposed to the markup picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Therefore, the Applicants respectfully submit that Xu fails to disclose, implicitly or explicitly, a moving of an input item focus from the object picture to the markup picture (and not an object picture), as recited in claim 16.

Regarding the rejection of independent claim 17, it is noted that amended claim 17 recites "moving an input item focus... from a markup picture input item to an object picture input item, and from an object picture input item to a markup picture input item according to a predetermined order." In contrast, Xu teaches a method of moving a focus **from one object picture (frame) to another object picture.** That is, Xu does not suggest a method of moving the focus from an object picture to a markup picture. In fact, the FIG. 5A cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing moves to another object picture, as opposed to the markup picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Furthermore, Xu does not suggest a method of moving the focus from a markup picture to an object picture. In fact, the FIG. 5A cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, "...inside the current frame"). Moreover, on page 2 of the Advisory Action, the Examiner states that Xu teaches a transfer of the focus from

one input item to another input item. However, the independent claim 17 is clearly distinguishable in that the focus is not merely moved from one input item to another, but **from an object picture input item to a markup picture input item or from a markup picture input item to an object picture input item**. Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of a focus between an object picture and a markup picture, as clarified and recited in claim 17.

Regarding the rejection of claim 19, it is noted that this claim depends from claim 17 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of claim 20, it is noted that this claim depends from claim 19 and is, therefore, allowable for at least the reasons set forth above.

Claims 11 is rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Mobini et al. (U.S. Patent 6,564,255), hereinafter "Mobini". The Applicants respectfully traverse and request reconsideration. Regarding the rejection of claim 11, it is noted that this claim depends from claim 10 and is, therefore, allowable for at least the reasons set forth above.

Claim 21 is rejected 35 U.S.C. §103(a) as being unpatentable over Mobini in view of Xu. The Applicants respectfully traverse and request reconsideration. Regarding the rejection of independent claim 21, it is noted that amended claim 21 recites "moving an input item focus... from a markup picture input item to a DVD object picture input item, and from a DVD object picture input item to a markup picture input item." In contrast, Xu teaches a method of moving a focus **from one object picture (frame) to another object picture**. That is, Xu does not suggest a method of moving the focus from an object picture to a markup picture. In fact, the FIG. 5A cited by the Examiner clarifies that the focusing moves to another object picture, as opposed to the markup picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Furthermore, Xu does not suggest a method of moving the focus from a markup picture to an object picture. In fact, the FIG. 5A cited by the Examiner clarifies that the focusing is initially in one object picture, as opposed to in the markup picture (operation 510A, "...inside the current frame"). Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of a focus between an object picture and a markup picture, as clarified and recited in claim 21.

Claims 18 and 22-25 are rejected under 35 U.S.C. §103(a) as being unpatentable over Herigstad in view of Xu and further in view of Mobini. The Applicants respectfully traverse and

request reconsideration.

Regarding the rejection of claim 18, it is noted that this claim depends from claim 17 and is, therefore, allowable for at least the reasons set forth above.

Regarding the rejection of independent claim 22, it is noted that claim 22 recites "moving an input item focus... from an interactive picture input item to an object picture input item, and from an object picture input item to an interactive picture input item." In contrast, Xu teaches a method of moving a focus **from one object picture (frame) to another object picture**. That is, Xu does not suggest a method of moving the focus from an object picture to an interactive picture (in which the object picture is embedded). In fact, the FIG. 5A cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing moves to another object picture, as opposed to the interactive picture (operation 540A, "...is there an embedded frame in the direction of direction command," and 590A, if no embedded frames found, exit). Furthermore, Xu does not suggest a method of moving the focus from an interactive picture to an object picture. In fact, the FIG. 5A cited by the Examiner on page 2 of the Advisory Action mailed on September 6, 2007 clarifies that the focusing is initially in one object picture, as opposed to in the interactive picture (operation 510A, "...inside the current frame"). Moreover, on page 2 of the Advisory Action, the Examiner states that Xu teaches a transfer of the focus from one input item to another input item. However, the independent claim 22 is clearly distinguishable in that the focus is not merely moved from one input item to another, but **from an object picture input item to an interactive picture input item or from an interactive picture input item to an object picture input item**. Therefore, the Applicants respectfully submit that Xu fails to disclose a moving of a focus between an object picture and an interactive picture (in which the object picture is embedded), as clarified and recited in claim 22.

Regarding the rejections of claims 23-25, it is noted that these claims depend from claim 22 and are, therefore, allowable for at least the reasons set forth above.

Based on the foregoing, this rejection is respectfully requested to be withdrawn.

CONCLUSION:

There being no further outstanding objections or rejections, it is submitted that the application is in condition for allowance. An early action to that effect is courteously solicited.

Finally, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to these matters.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

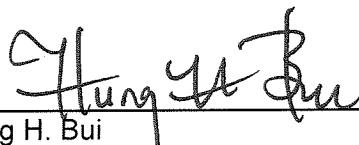
Respectfully submitted,

STEIN, MCEWEN & BUI, LLP

Date: _____

6/1/07

By: _____



Hung H. Bui

Registration No. 40,415

1400 Eye St., N.W.
Suite 300
Washington, D.C. 20005
Telephone: (202) 216-9505
Facsimile: (202) 216-9510